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14 Attorneys for Plaintiffs

15  
16 BEST BUY CO., INC.; BEST BUY PURCHASING LLC; BEST  
17 BUY ENTERPRISE SERVICES, INC.; BEST BUY STORES,  
18 L.P.; BESTBUY.COM, LLC

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC  
MDL No. 1917

This Document Relates to:  
*Best Buy Co. Inc. et al. v. Hitachi, Ltd. et al.*,  
No. 3:11-cv-05513-SC  
*ViewSonic Corp. v. Chunghwa Picture Tubes,  
Ltd. et al.*, No. 3:14-cv-02510-SC

DECLARATION OF ALAN S.  
FRANKEL IN SUPPORT OF  
OPPOSITION TO CHUNGHWA  
PICTURE TUBES, LTD. AND  
CHUNGHWA PICTURE TUBES  
(MALAYSIA) SDN. BHD.'S MOTION  
IN LIMINE TO EXCLUDE OPINIONS  
REGARDING ACTUAL DAMAGES  
ATTRIBUTABLE TO THE  
CHUNGHWA DEFENDANTS

[DEFENDANTS' MIL NO. 21]

Date: TBD  
Time: TBD  
Place: Courtroom 1  
Judge: Hon. Samuel Conti

1 I, Alan S. Frankel, declare and state as follows:

2 1. I am President of Coherent Economics, LLC. I have been retained as an expert  
3 witness by Plaintiffs in the above-captioned actions currently pending in the United States District  
4 Court for the Northern District of California. The facts set forth herein are true of my own  
5 personal knowledge, except where based on a review of the pleadings and records in this action,  
6 and, if called as a witness, I could and would competently testify thereto.

7 2. In my capacity as an expert witness for sixteen Plaintiffs in these actions, I  
8 submitted a series of expert reports, including reports for Best Buy<sup>1</sup> and ViewSonic Corporation  
9 ("ViewSonic"). The reports were largely similar across the different Plaintiffs, but took into  
10 account some of the issues and data specific to each Plaintiff. My qualifications were described  
11 in detail in my initial expert reports.

12 Best Buy

13 3. On April 15, 2014, I submitted the expert report for Best Buy (the "Best Buy  
14 Report"). In preparing the Best Buy Report, I was asked, among other things, to [REDACTED]

15 [REDACTED]  
16 [REDACTED] I was also asked  
17 to [REDACTED]  
18 [REDACTED]  
19 [REDACTED] For the latter computation, [REDACTED]

20 4. I have been asked by counsel for Best Buy to explain [REDACTED]

21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]

24 5. [REDACTED]  
25 [REDACTED]  
26 [REDACTED]

27 28 <sup>1</sup> "Best Buy" consists of Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise  
Services, Inc., Best Buy Stores, L.P., and Bestbuy.com, L.L.C.

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1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 6. For example, [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 7. [REDACTED]  
10 [REDACTED]  
11 11. [REDACTED]<sup>2</sup> For example, [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 8. [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 9. At my deposition on July 10, 2014, I testified that [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

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1 [REDACTED]  
2 [REDACTED]  
3 10. [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 11. [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED], [REDACTED]  
15 [REDACTED]  
16 12. In preparing Tables 1 and 2, [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 ViewSonic

20 13. On June 6, 2014, I submitted an expert report on behalf of ViewSonic (the  
21 "ViewSonic Report"). In the ViewSonic Report, I was asked, among other things, to [REDACTED]

22 [REDACTED]  
23 I was instructed by counsel for ViewSonic [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

26  
27 <sup>3</sup> This computation will understate damages attributable to Chunghwa CPTs, because  
28 Chunghwa's share of sales of small CPTs must exceed its share of sales of all CPTs if it made no  
large CPTs.

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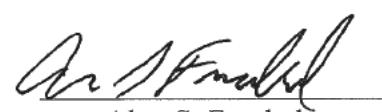
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14. The work that I performed in the ViewSonic Report [REDACTED]

15. Attached to my declaration as Exhibit C is Table 3, [REDACTED]

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed this 27th day of February 2015 in Highland Park, IL.

  
Alan S. Frankel